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LIS PENDENS/  
NOTICE OF FORECLOSURE



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Date: 09/24/2009 02:34 PM Pg: 1 of 3

PA0914048

STATE OF ILLINOIS

ATTY NO. 91220

COUNTY OF COOK

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - CHANCERY DIVISION

BAC HOME LOANS SERVICING, LP FKA )  
COUNTRYWIDE HOME LOANS SERVICING LP )

PLAINTIFF )

NO. )

**09 CH 31050**

VS )

JUDGE )

SUZANNE DUBMAN A/K/A SUZANNE M. DUBMAN )  
MARVIN KUSHNER; CHERI KUSHNER; JPMORGAN )  
CHASE BANK, N.A. SUCCESSOR BY MERGER TO )  
WASHINGTON MUTUAL BANK, F.A.; PETER )  
ROBIN FARMS UNIT 3 CONDOMINIUM )  
ASSOCIATION; UNKNOWN HEIRS AND )  
LEGATEES OF BEVERLY KUSHNER, IF ANY; )  
UNKNOWN OWNERS AND NON RECORD CLAIMANTS )

DEFENDANTS )

## NOTICE OF FORECLOSURE

I, the undersigned, do hereby certify that the above entitled cause was filed in the above Court on the \_\_\_\_\_ day of AUG 31 2009, for Foreclosure of a Mortgage and that the property affected by said cause is described as follows:

ITEM 1: UNIT 8B AS DESCRIBED IN SURVEY DELINEATED ON AND ATTACHED TO AND A PART OF A DECLARATION OF CONDOMINIUM OWNERSHIP REGISTERED ON THE 21ST DAY OF DECEMBER, 1973 AS DOCUMENT NUMBER 2732977. ITEM 2: AN UNDIVIDED PERCENTAGE INTEREST (EXCEPT THE UNITS DELINEATED AND DESCRIBED IN SAID SURVEY) IN AND TO THE FOLLOWING DESCRIBED PREMISES: LOTS 1 TO 22, BOTH INCLUSIVE, LOTS 27 TO 39, BOTH INCLUSIVE, ALSO THOSE PARTS OF LOTS 23 TO 26, BOTH INCLUSIVE, AND OF OUTLOT 1 FALLING IN THE SOUTHEAST QUARTER (1/4) OF SECTION 7 (HEREINAFTER DESCRIBED), ALL IN PETER-ROBIN FARMS UNIT THREE, BEING A SUBDIVISION OF PART OF THE EAST HALF (1/2) OF SECTION 7, TOWNSHIP 41 NORTH, RANGE 10, EAST OF THE THIRD

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note discharged in a Bankruptcy proceeding or if said liability has been otherwise discharged or released.

6. That should the subject property be vacant, the Plaintiff may seek to have the Court find that the property is abandoned pursuant to 735 ILCS 5/15-1603, Illinois Code of Civil Procedure.
7. That the Plaintiff may seek appointment of Mortgagee in Possession or appointment of receiver.

WHEREFORE, PLAINTIFF REQUESTS:

1. A Judgment of Foreclosure and Sale.
2. A Judgment for attorneys' fees, costs and expenses.
3. An Order Approving the Foreclosure Sale and an Order granting possession.
4. An In Personam or an In Rem Deficiency Judgment, if sought, unless defendant(s) have had personal liability on the subject mortgage note discharged in a Bankruptcy proceeding, or otherwise released.
5. An order granting a shortened redemption period, if sought.
6. Appointment of Mortgagee in Possession or Receiver, if sought.
7. Such other and further relief as the Court deems just.

BAC HOME LOANS SERVICING, LP FKA COUNTRYWIDE HOME LOANS  
SERVICING LP

By: 

PIERCE & ASSOCIATES  
Its Attorneys

**Margaret O'Donnell**  
ARDC # 6287000

PIERCE & ASSOCIATES, Attorneys for Plaintiff, Suite 1300  
1 North Dearborn, Chicago, Illinois 60602  
TEL. (312) 346-9088, FAX (312) 346-1557, PA0914048

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STATE OF ILLINOIS

ATTY NO. 91220

COUNTY OF COOK

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - CHANCERY DIVISION

BAC HOME LOANS SERVICING LP FKA 10:09 )  
COUNTRYWIDE HOME LOANS SERVICING LP )

09CH31050

COURT OF COOK  
ILLINOIS  
CHANCERY DIVISION  
PLAINTIFF )

NO. )

VS )

CLERK  
COROTHE )

JUDGE )

SUZANNE DUBMAN A/K/A SUZANNE M. DUBMAN; )  
MARVIN KUSHNER; CHERI KUSHNER; JPMORGAN )  
CHASE BANK, N.A. SUCCESSOR BY MERGER TO )  
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ROBIN FARMS UNIT 3 CONDOMINIUM )  
ASSOCIATION; UNKNOWN HEIRS AND )  
LEGATEES OF BEVERLY KUSHNER, IF ANY; )  
UNKNOWN OWNERS AND NON RECORD CLAIMANTS )  
;

DEFENDANTS )

COMPLIANCE WITH PREDATORY LENDING DATABASE SECTION OF  
RESIDENTIAL REAL PROPERTY DISCLOSURE ACT

To: Illinois Department of Financial and Professional Regulation  
122 S. Michigan Ave., 19th Floor  
Chicago, Illinois 60603

CERTIFICATION

I, Margaret O'Donnell attorney, certify that I prepared this notice on  
to be filed along with a copy of the lis pendens notice with  
the above entitled address.

(X) Under penalties as provided by law  
pursuant to 735 ILCS 5/1-109, I certify  
that the statements set forth herein are  
true and correct.

Margaret O'Donnell  
SIGNATURE

Pierce & Associates, P.C.  
1 N. Dearborn, Suite 1300  
Chicago, IL 60602  
312-346-9088  
Atty. No. 91220  
PA 0914048